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SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN MATEO

LUIS R. CHAVARRIA RAMIREZ,
individually, and on behalf of other members
of the general public similarly situated;

Plaintiff,

v.

PROSPECT INTERNATIONAL AIRPORT
SERVICES CORPORATION, a Nevada
corporation; PROSPECT AIRPORT
SERVICES, INC., an unknown business
entity; and DOES 1 through 100, inclusive,

Defendants.

Case No.: 21-CIV-03392

[Consolidated with Case No. 21-CIV-03393]

**DECLARATION OF LUIS R.
CHAVARRIA RAMIREZ IN SUPPORT
PLAINTIFF'S MOTION FOR AN
AWARD OF ATTORNEY'S FEES AND
COSTS AND INCENTIVE AWARD**

Date: July 29, 2025

Time: 2:00 p.m.

Dept: 4

FAC Filed: January 10, 2024

Jury Trial Date: None Set

DECLARATION OF LUIS R. CHAVARRIA RAMIREZ

I, Luis R. Chavarria Ramirez, declare as follows:

1. I am the named plaintiff and seek to represent the putative Class in the above-captioned consolidated action (“Consolidated Action”). I am over the age of 18. The following statements are based on my personal knowledge. If called upon to testify as to the matters stated herein, I could and would do so competently.

2. I submit this Declaration in Support of Plaintiff’s Motion for an Award of Attorney’s Fees and Costs and Incentive Award (“Motion”).

3. I was employed by Defendants Prospect International Airport Services Corporation and Prospect Airport Services, Inc. (“Defendants”) from approximately January 23, 2019 to March 25, 2020, as a passenger service assistant providing wheelchair assistance to passengers at San Francisco International Airport.

4. During my employment with Defendants, I experienced various workplace issues that are described in the complaint filed in this Consolidated Action. These firsthand experiences motivated me to pursue this case not only for myself, but for my coworkers as well.

5. I retained Schneider Wallace Cottrell Kim LLP (“SWCK”) and Lawyers *for* Justice (“LFJ”) to represent me in the Consolidated Action.

6. I have been committed to this Consolidated Action for **over three years** and have taken my role as a potential class representative seriously. I understood from the outset that serving in this capacity would require sustained effort, diligence, and a willingness to put the interests of the Class above my own.

7. Before the lawsuit was filed, I had multiple telephonic interviews with my attorneys about my work experiences, possible claims, and my duties as a named plaintiff and Class representative in this litigation. I understand that these duties include participating actively in the

1 litigation, reviewing significant events in the litigation, keeping abreast of the status and progress of
2 the litigation, and considering the interests of the Class and putting those interests ahead of my own. I
3 knew that there was no guarantee that we would be successful in this case, and that there was a
4 significant chance of protracted litigation. I realized that my name would be on a class and Private
5 Attorneys General Act (“PAGA”) action. I also understood that I may be required to spend a significant
6 amount of time on the discovery process and understood that my time may need to be doubled up
7 because there were two actions that were initially filed. Still, I decided that I would serve as a named
8 plaintiff, Class representative and PAGA representative in both actions so that all of Defendants’
9 employees could obtain what I believe they were owed.
10

11 8. In November and December 2021, I spent approximately 1.5 hours in interviews with
12 counsel, providing comprehensive details about my job duties, timekeeping practices, and experiences
13 with missed or late breaks. I also educated myself about the structure and objectives of class and PAGA
14 actions and what it meant to serve as a class representative and represent the State of California in a
15 PAGA case.
16

17 9. In the January 2022 to February 2022 timeframe, I estimate I spent approximately 3 hours
18 talking with my attorneys about issues in the case, searching for relevant documents, looking for my
19 CBA, and contacting my union to obtain materials.
20

21 10. In the March 2022 to September 2022 timeframe, I continued to stay up to date about
22 the case through regular communications with my attorneys, and continued to answer their questions
23 as I understand they were trying to figure out what documents and information to try to get from
24 Defendants. At some point, my attorneys also told me that there was a potential mediation and
25 explained to me that I would need to set aside additional time to help with any preparations and be
26 available the entire day during the mediation. I estimate I communicated my attorneys on an average
27 of once a month for approximately 10 minutes average each communication.
28

1 11. In October and November 2022, I estimate I spent approximately 3 hours going over
2 documents and information that my attorneys got from Defendants and answering questions as my
3 attorneys prepared for mediation. I stayed on call for the whole day, for approximately 8 hours, on
4 November 17, 2022 for the mediation to answer questions from my attorneys.

5 12. In the December 2022 to July 2023 timeframe, I continued to stay up to date about the
6 case through communications with my attorneys. I understood that they were going to get additional
7 documents, talk to additional employees, and attend a second mediation. I understood that I would need
8 to again set aside time to help with any preparations and be available the entire day during the second
9 mediation. As my attorneys looked through the additional documents Defendants provided and talked
10 to additional employees, I estimate I spent approximately 2.5 hours in helping my attorneys prepare for
11 second mediation. My attorneys asked me a lot of questions about the information in the documents
12 and what employees were telling them, and I tried my best to return my attorneys' calls as soon as
13 possible and provide as much information as possible.
14

15 13. On July 17, 2023, I stayed on call for the whole day, for approximately 8 hours, for the
16 second mediation to answer questions from my attorneys.
17

18 14. Throughout this litigation, I have contributed numerous unpaid hours of my personal
19 time—across evenings, weekends, and during other obligations—because I believed in the importance
20 of holding Defendants accountable and achieving justice for my coworkers. I maintained continuous
21 communication with counsel, responded thoroughly to all inquiries, and kept myself informed of all
22 key developments in the litigation.
23

24 15. Once we reached a settlement, I discussed the settlement with my attorneys, and carefully
25 reviewed the documents that they sent me. I spent at least 2.5 hours reading and assisting my attorneys
26 finalize the settlement. I carefully read and approved the September 2023 MOU, the January 2024
27
28

1 settlement agreement, and the May 2024 motion for preliminary approval, including my declaration for
2 preliminary approval.

3 16. After June 2024, I understood that Defendants had a mistake regarding the number of
4 workweeks and the settlement would have to be renegotiated. As my attorneys renegotiated the
5 settlement, I stayed up to date on the negotiations. I was feeling disheartened of the long time it was
6 taking but I was convinced that I had to continue to do my best to serve as the Class representative and
7 committed myself to seeing this to the end.
8

9 17. Once the amended settlement was reached, I discussed the amended settlement with my
10 attorneys, and carefully reviewed the documents that they sent me. I spent at least 2 hours
11 communicating with the attorneys on their renegotiation, and reading and assisting my attorneys
12 finalize the amended settlement agreement and the supplemental motion papers.
13

14 18. I estimate I spent another 1 hour reviewing my final approval declaration, talking to my
15 attorneys about the Court's ruling on the motion for final approval, and reviewing the instant
16 declaration.
17

18 19. I believe that I have done everything that my attorneys have asked of me and have tried,
19 to the best of my ability, to represent the Class and the aggrieved employees on behalf of the State of
20 California. As discussed above I devoted at least 33 hours of my personal time to this case.
21

22 20. Also to make this settlement a reality, I agreed to a general release. I understand that
23 everyone else is releasing the claims that were or could be in the complaint. I am releasing any and all
24 of my claims, including my individual claims or right to payments that I may discover at a later time
25 that I had or have against Defendants.
26

27 21. Aside from the payment I am eligible to receive as a putative Class member and an
28 enhancement payment for serving as the class representative, subject to Court approval, I am not
receiving any other benefits from this Settlement.

22. In sum, I respectfully submit that the time, effort, and personal commitment I have devoted over more than three years were essential to the successful resolution of case. My participation helped build the evidentiary record, informed strategic decisions, and facilitated two full-day mediations that ultimately led to a class-wide recovery. I understand no one has objected to this settlement or my requested service award. I therefore respectfully ask the Court to approve the requested Incentive Award of \$15,000 in recognition of the significant role I played in securing this outcome.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 14, 2025 in San mateo, California.

[Handwritten signature]

Luis R. Chavarria Ramirez